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12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE NORTHERN DISTRICT OF CALIFORNIA

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15 UNITED STATES OF AMERICA,) No. CR-11 00669 SBA
16 vs.)
17 Plaintiff,) STIPULATION AND ORDER
18) CONTINUING STATUS CONFERENCE
19)
20 THOMAS CALISE,)
21)
22 Defendant.)
23)
24)
25)

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28 This matter is set for a status conference on 21 February 2012. The indictment alleges
29 several counts of tax evasion and failure to file tax returns, dating as far back as 2003. To date
30 the government has produced over five thousand pages of discovery.

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32 The defense is continuing its review of these documents and has conducted a number of
33 witness interviews. One remaining witness has yet to be located and interviewed. In addition,
34 the parties are jointly investigating the amount(s) of alleged tax loss(es) for the years in question.
35 The defense is seeking approval to consult with a tax expert concerning the alleged tax liabilities
36 at issue.

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38 For these reasons, IT IS STIPULATED AND AGREED that this matter be continued to

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1 March 6, 2012, and that time under the Speedy Trial Act be excluded until that date because the
2 ends of justice outweigh the best interest of the public and the defendant in a speedy trial, and for
3 effective preparation of defense counsel, taking into account the exercise of due diligence. 18
4 U.S.C. § 3161(h)(7)(A) and (B)(iv). By that date, the parties expect to be able to report to the
5 Court whether this matter will resolve or be set for motions and trial.

6 /s/

7 Dated: February 16, 2012

THOMAS M. NEWMAN
Assistant United States Attorney

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10 Dated: February 16, 2012

JEROME E. MATTHEWS
Assistant Federal Public Defender

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13 Good cause appearing therefor, IT IS ORDERED that this matter be continued until
14 March 6, 2012, and that time under the Speedy Trial Act be excluded from February 17, 2012
15 until March 6, 2012 because the ends of justice outweigh the best interest of the public and the
16 defendant in a speedy trial, and for effective preparation of defense counsel, taking into account
17 the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

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19 Dated: February 21 2012


SAUNDRA BROWN ARMSTRONG
United States District Judge

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